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Southern Nuclear Operating Company
Vogtle Electric Generating Plant Unit 4
ITAAC Closure Notification on Completion of ITAAC 2.2.03.08c.iv.01 [Index Number 183]

Ladies and Gentlemen:

In accordance with 10 CFR 52.99(c)(1), the purpose of this letter is to notify the Nuclear Regulatory Commission (NRC) of the completion of Vogtle Electric Generating Plant (VEGP) Unit 4 Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Item 2.2.03.08c.iv.01 [Index Number 183]. The ITAAC verifies that the maximum elevation of the top inside surface of the In-containment Refueling Water Storage Tank (IRWST) injection lines and IRWST connection to Direct Vessel Injection (DVI) nozzles is less than the elevation of IRWST bottom inside surface and that the elevation of the IRWST bottom inside tank surface is higher than the DVI nozzle centerlines by ≥ 3.4 ft. The closure process for this ITAAC is based on the guidance described in NEI 08-01, "Industry Guideline for the ITAAC Closure Process under 10 CFR Part 52," which was endorsed by the NRC in Regulatory Guide 1.215.

This letter contains no new NRC regulatory commitments. Southern Nuclear Operating Company (SNC) requests NRC staff confirmation of this determination and publication of the required notice in the Federal Register per 10 CFR 52.99.

If there are any questions, please contact Kelli A. Roberts at 706-848-6991.

Respectfully submitted,

Michael J. Yox
Regulatory Affairs Director Vogtle 3 & 4

Enclosure: Vogtle Electric Generating Plant (VEGP) Unit 4
Completion of ITAAC 2.2.03.08c.iv.01 [Index Number 183]

MJY/RMS/sfr

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Southern Nuclear Operating Company
ND-21-0328
Enclosure

Vogtle Electric Generating Plant (VEGP) Unit 4
Completion of ITAAC 2.2.03.08c.iv.01 [Index Number 183]

ITAAC Statement

Design Commitment

8.c) The PXS provides RCS makeup, boration, and safety injection during design basis events.

Inspections,Tests, Analyses

iv) Inspections of the elevation of the following pipe lines will be conducted:

1. IRWST injection lines; IRWST connection to DVI nozzles

v) Inspections of the elevation of the following tanks will be conducted:

2. IRWST

Acceptance Criteria

iv) The maximum elevation of the top inside surface of these lines is less than the elevation of:

1. IRWST bottom inside surface

v) The elevation of the bottom inside tank surface is higher than the direct vessel injection nozzle centerline by the following:

2. IRWST ≥ 3.4 ft

ITAAC Determination Basis

Multiple ITAAC are performed to demonstrate that the Passive Core Cooling System (PXS) provides Reactor Coolant System (RCS) makeup, boration, and safety injection during design basis events. This ITAAC requires that inspections be conducted to verify that the maximum elevation of the top inside surface of the In-containment Refueling Water Storage Tank (IRWST) injection lines and IRWST connection to Direct Vessel Injection (DVI) nozzles is less than the elevation of IRWST bottom inside surface and that the elevation of the IRWST bottom inside tank surface is higher than the DVI nozzle centerlines by ≥ 3.4 ft.

The inspection of the IRWST injection lines top inside surface, IRWST connection to the DVI nozzles top inside surface, the DVI nozzle centerline, and the IRWST bottom inside tank surface elevations were performed using survey equipment in accordance with the site survey and measurement procedure (Reference 1). The conservative wall thickness, derived from installed pipe data, was subtracted from the top-of-pipe survey data to obtain the highest elevation of the inside surface of these lines. The maximum derived elevation of the IRWST injection lines top inside surface, the DVI nozzle centerline, and IRWST connection to the DVI nozzles top inside surface is compared to the measured elevation of the IRWST bottom inside tank surface using a common reference point.

The inspection results are documented in the Principal Closure Documents (References 2 and 3), supporting the ITAAC 2.2.03.08c.iv.01 Completion Package (Reference 4). Reference 2 determined that the maximum elevation of the top inside surface of the IRWST injection lines and IRWST connection to the DVI nozzles is 100.7 feet and are lower than the 103.0 foot elevation of the IRWST bottom inside surface. Reference 3 determined that both DVI nozzle centerline elevations are 99.6 feet, which are 3.4 feet below the 103.0 foot elevation of IRWST bottom inside surface, and therefore both Acceptance Criteria are met.

The Principal Closure Documents exists and are available for NRC inspection as well as the ITAAC 2.2.03.08c.iv.01 Completion Package.

ITAAC Finding Review

In accordance with plant procedures for ITAAC completion, Southern Nuclear Operating Company (SNC) performed a review of all ITAAC findings pertaining to the subject ITAAC and associated corrective actions. This review found that there are no relevant ITAAC findings associated with this ITAAC. The ITAAC completion review is documented in the ITAAC Completion Package for ITAAC 2.2.03.08c.iv.01 (Reference 4) and available for NRC review.

ITAAC Completion Statement

Based on the above information, SNC hereby notifies the NRC that ITAAC 2.2.03.08c.iv.01 was performed for VEGP Unit 4 and that the prescribed acceptance criteria are met.

Systems, structures, and components verified as part of this ITAAC are being maintained in their as-designed, ITAAC compliant condition in accordance with approved plant programs and procedures.

References (available for NRC inspection)

1. 4MP-T81C-N3201 Rev 1 “Construction Survey”
2. SV4-PXS-FSK-800183 Rev 0, "As-Built IRWST Injection Lines Top Inside Surface Elevation Comparison to IRWST Bottom Inside Surface"
3. SV4-PXS-MTK-800183 Rev 1, "IRWST Floor Elevation Comparison to DVI Nozzle Centerline Elevation"
4. 2.2.03.08c.iv.01-U4-CP-Rev 0, ITAAC Completion Package